

October 28, 2004

Dear F.C.C. Commissioners,

My name is Alan Goodman, and I am President of the Columbus Radio Group which is comprised of WSNY, WJZA, WJZK and WODB in Columbus Ohio.

Years ago your predecessors acknowledged with great clarity and wisdom that the need for the Commission to require broadcasters to provide Public Affairs Programming and other forms of "Localism" was no-longer necessary. The foundation for their decision was the recognition that it was in the best interest of broadcasters to participate in, and promote their individual contribution to the community in which they were licensed. They, your predecessors, in my opinion were right. My opinion is borne out of better than 30 years of experience in broadcasting at various management positions in markets sizes ranging from New York City to Colby Kansas.

The motivation for broadcasters to exceed the previous mandated requirements are as diverse as the people employed at radio operations throughout America. Hopefully a review by the various operating departments and the personnel of a radio station will help to clarify my point.

#### News Department

These are among the most idealistic employees you could find at a radio station. They are simply driven by the need to inform the community in which they broadcast information that is critical to listeners lives. This information takes many forms including news, weather, traffic reports, emergency school closings due to weather, public affairs programming aimed at critical issues in the community and emergency news information. They are also motivated by their personal need to be the best and most accurate in the market. They take their responsibilities and position at the station and in the community very seriously. As an example our News Director is singularly responsible for bringing Amber Alert not only to Columbus, while he coordinated the acceptance of this program throughout the state of Ohio. His journey began four years ago in a meeting with me when he asked me if we would underwrite his efforts.

The importance of a radio station owning a position of credibility of news and information in the minds of listeners is supported by the amount of fierce competition both inside and outside of our medium to occupy that very position in the consumers mind.

As such, it is in our best interest, and those of our competitors best interest to own that position.

#### Programming Department

The programming department recognizes that regardless of size of market there is simply a tremendous amount of competition for listeners to their station. Within the spectrum of radio formats, there are varying shades of gray with regard to format exclusivity. While the music program directors select is critical, most often it is that which is between the music that defines success. A high percentage of that content evolves around the stations involvement in community events as well as updated weather and news. And the reason that the content between the music is so critical is that programming and market research tells us that our listeners want to know that their favorite radio station is an active partner in the community that we broadcast in. How well the programming people perform their jobs is defined by ratings reports that we receive regularly.

As such, it is in our best interest, and those of our competitors best interest, to satisfy that which the community deems necessary.

#### Sales Department

The success of a sales department is defined by the amount of revenue they generate from advertising. Their success is entirely predicated on the position of credibility their station has within the community and within the business community. On every sales call and presentation that they make, the stature in terms of ratings and their stations community involvement is an integral part of their capturing advertising budgets from their customers.

As such, it is in our best interest, and those of our competitors best interest to be the very best radio station in our communities.

#### Marketing and Promotion Department

Among this departments primary responsibilities is to get our radio stations out of the studios and into the community. Whether it's to promote and raise money for a church or charity, or to promote a community event ranging from cake sales to art exhibits, our industry is there. This departments primary task is insure that we get recognized by our listeners as the most active radio station in our community.

As such, it is our best interest and the best interest of our competitors to be involved in our communities.

#### General Administration

The financial success of any radio station is predicated on the recognition by this department that each of the departments are intricately connected by one common denominator. That common denominator is the "Good Will" that our stations accomplish within the community in which we broadcast. And that "Good Will" is defined by how our listeners, by how our community leaders, and by how our business community perceive us in the market in which we are licensed. Without question the degree of our success is directly proportionate to how much "Good Will" we achieve in our markets.

As such, it is in our best interest and those interests of our competitors to generate as much "Good Will" as we possibly can.

Of course, the Commissions response to the above, could be "If we are already doing it, why not document it?" The answer, as in most things, is answered by history. When we as broadcasters were compelled to document our local involvement, we did so to satisfy you. And so we committed to minimum standards required by you. Today, since the rulings by your predecessors, we do far more than you would ever require us to do.

We do so in our industry because it is tantamount to our best interest to do so.

Below, I have also listed just a few of the events in which our stations participated during the past year. We did so because it is in the best interested of our communities and as such in our best interests as well.

Respectively

Alan Goodman

1. Dino & Stacy's 95-Hour Marathon for Columbus Children's Hospital - Raised \$468,378 in 2004 and over \$2.5 million dollars since 1986; (we're not affiliated with the national CMN network...ours is all locally driven)
2. Amber Alert – Clark Donley, our News Director, implemented the program locally
3. Christmas Wish (locally funded by Sunny 95 & Beazer Homes); granting wishes to over 20 needy Central Ohio families each December
4. Columbus Symphony Orchestra annual sponsor for Family Series and Picnic with the Pops, their largest fundraiser of the year.
5. Mid-Ohio Food Bank (Annual Food Drive from all CRG stations)
6. James Cancer Hospital – Breast Cancer Awareness campaign each October; recruiting women to get mammograms
7. Music in the Air (Columbus Recreation & Parks branch promoting local musicians)
8. Make-A-Wish Foundation (all local dollars – raised from Oldies 107.9 & Smooth Jazz)
9. BalletMet annual sponsor for entire season including the Nutcracker
10. Easter Seals annual sponsor; two Mktg Dept staff members sit on their Marketing Committee
11. Mt. Carmel Foundation
12. Arthritis Foundation – Jingle Bell Run, Wine & Dine Event, bowl-a-thons
13. Columbus Jazz Orchestra/Jazz Arts Group
14. CrimeStoppers
15. Stonewall Columbus – Night Out and All That Jazz; organizational fundraiser for the Gay & Lesbian Organization
16. American Cancer Society – Light the Night for Breast Cancer Awareness; Susan Komen Foundation Race for the Cure in May
17. American Heart Association – Go Red for Women Campaign each February for female heart disease
18. Cystic Fibrosis Stairclimb annual sponsor
19. Multiple Sclerosis Society – Spring 5K Walk
20. Leukemia Society – Light the Night for Sight Walk